

quinn emanuel trial lawyers | new york

51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 FAX (212) 849-7100

WRITER'S DIRECT DIAL NO.
(212) 849-7140

WRITER'S EMAIL ADDRESS
marcgreenwald@quinnemanuel.com

March 12, 2021

VIA ECF

Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Application GRANTED. Sentencing and Mr. Ashu's surrender date are hereby ADJOURNED to June 4, 2021, at 2:00 p.m. In the event of any future motion for extension or adjournment, counsel shall address whether or when Mr. Ashu is eligible for the COVID-19 vaccine. The Clerk of Court is directed to terminate Doc. #151. SO ORDERED.



Re: United States v. Ashu, 19 Cr. 318 (JMF)

March 12, 2021

Dear Judge Furman:

We are counsel to Defendant Cyril Ashu and write respectfully to request that the Court extend the control date for sentencing to May 31, 2021, and also extend Mr. Ashu's bail conditions to that date. We have conferred with the Government which has consented to these requests.

Since Mr. Ashu was released on April 2, 2020, he has complied with all conditions and has been supervised without incident by the Pre-Trial Services agency in the Northern District of Georgia. Mr. Ashu previously requested and was granted six extensions of bail with the Government's consent. Dkts. 102, 109, 130, 139, 142, 147. Mr. Ashu is presently due to surrender on March 30, 2021, which is also his sentencing control date. Dkt. 147.

In support of the continued bail request, we note that Mr. Ashu was released "in light of the dire circumstances presented by COVID-19." Dkt. 90. COVID-19 continues to threaten New York City and its immediate environs and interstate travel remains hazardous. We respectfully submit that the "compelling reasons" for Mr. Ashu's release have not changed and we respectfully request that the deadline for Mr. Ashu's surrender and the sentencing control date both be extended to May 31, 2021.

quinn emanuel urquhart & sullivan, llp

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Respectfully,

/s/ Marc Greenwald

Marc Greenwald

cc: AUSAs Olga Zverovich and Jarrod Schaeffer (via ECF)